

REMARKS

Claims 19-27 are pending and under consideration. Claims 19-22 have been amended. Support for the amendments to the claims may be found in the claims as originally filed. This amendment is believed to place the application in condition for allowance, and entry therefore is respectfully requested. In the alternative, entry of this amendment is requested as placing the application in better condition for appeal by, at least, reducing the number of issues outstanding. Further reconsideration is requested based on the foregoing amendment and the following remarks.

Response to Arguments:

The Applicants appreciate the consideration given to their arguments. The Applicants, however, are disappointed that their arguments were not found to be persuasive. The final Office Action asserts in section 4, at page 7, that:

In response to applicant's argument that the references fail to show certain features of applicant's invention, it is noted that the features upon which applicant relies (the two communication terminals t1 and t2 do not share the same session identifier, a session identifier for a session between two terminals is only used for that session) are not recited in the rejected claim(s).

Claims 19-22 have consequently been amended to recite, inter alia "the first session identification information S1 enabling only the first communications terminal T1 to identify communications between the second communications terminal T2 and the first communications terminal T1" and "the first session identification information S1 being determined by the first communications terminal T1 so as to be unique only at the first communications terminal T1."

Further reconsideration is thus requested.

Claim Rejections - 35 U.S.C. § 112:

Claim 19 was rejected under 35 U.S.C. § 112, second paragraph, as indefinite. Claim 19 was amended to make it more definite. Claim 19, in particular, now recites "communications terminal" in all cases. Withdrawal of the rejection is earnestly solicited.

Rejection under 35 U.S.C. §102:

Claims 19-23 were rejected under 35 U.S.C. § 102(e) as being anticipated by Petty, US Patent No. 6,337,858 (hereinafter referred to as "Petty"). The rejection is traversed, to the extent it might apply to the claims as amended. Reconsideration of the rejection is earnestly solicited.

In the claimed invention, a session identifier which establishes a session is used for only one terminal. The third clause of claim 19, in particular, recites:

The first session identification information S1 enabling only the first communications terminal T1 to identify communications between the second communications terminal T2 and the first communications terminal T1.

Petty neither teaches, discloses, nor suggests a "first session identification information S1 enabling only the first communications terminal T1 to identify communications between the second communications terminal T2 and the first communications terminal T1," as recited in claim 19. In Petty, rather, the call identification number is sent to another subscriber 34, not just to the CTI server 40 with which the web server 38 communicates. In particular, as described at column 13, lines 54-57:

The web server 38 then supplies a pager number from the rule base and instructs the CTI server to page the subscriber. The CTI server 40 dials the pager number using the PSTN and when the paging service answers the CTI server 40 sends the call identification number, which is displayed on the subscriber's pager.

Since Petty sends the call identification number to another subscriber, Petty has no "first session identification information S1 enabling only the first communications terminal T1 to identify communications between the second communications terminal T2 and the first communications terminal T1," as recited in claim 19.

If one were to suppose, moreover, that the Web server of Petty corresponded to the recited "first communications terminal," while the CTI server of Petty corresponded to the "second communications terminal," then the session identifier of Petty would end up being used by a session other than the session between the first and the second communications terminals. Since the session identifier of Petty would be used by a session other than the session between the first and the second communications terminals, Petty has no "first session identification information S1 enabling only the first communications terminal T1 to identify communications between the second communications terminal T2 and the first communications terminal T1," as recited in claim 19.

Each of the communications terminals of the claimed invention determines independently its own session identifiers. The session identifiers are determined to be unique within each of the communications terminals. Communications terminals T1 and T2, for example, identify one session between themselves by using their own session identifiers. Each of the two session identifiers, one for each of communications terminals T1 and T2, can be different from each other. The fourth clause of claim 19, in particular, recites:

The first session identification information S1 being determined by the first communications terminal T1 so as to be unique only at the first communications terminal T1.

Petty neither teaches, discloses, nor suggests "the first session identification information S1 being determined by the first communications terminal T1 so as to be unique only at the first communications terminal T1," as recited in claim 19. Petty, rather, describes a Web server 38 that generates a call identification number. The call identification number will be used to identify a call connection to a user client 18. In particular, as described column 13, lines 40-46:

On receipt of the option request, the web server 38 again instructs the CTI server 40 to hold the user and to generate a call identification number which will be used to identify the call connection to the user client 18. The identification number is recorded in a table together with a port number, for example, to identify the call connection in a manner well known in the art.

The call identification number of Petty, moreover, will be shared between a plurality of terminals, such as the Web server 38, and a CTI server which is common among the servers. This is clear from the fact that a call identification number generated by the Web server 38 is also used for the CTI server 40 to page a subscriber, as discussed above. Thus, the call connection number in Petty is common among the Web server 38 and the CTI server, rather than being unique to its generator only, i.e., the Web server 38. Since the call connection number in Petty is common among the Web server 38 and the CTI server, Petty shows no "first session identification information S1 being determined by the first communications terminal T1 so as to be unique only at the first communications terminal T1," as recited in claim 19.

Finally, in the claimed invention, each communications terminal determines session identifiers. The session identifiers are determined to be unique within each communications terminal. Communication terminals T1 and T2, for example, identify one session between themselves, by using two session identifiers. The two session identifiers used by a communication terminals T1 and T2 can be different from each other, or they can be the same.

Even if the session identifiers happened to be the same, however, it does not mean that the two communications terminals T1 and T2 share the same session identifier. The final clause of claim 19, in particular, recites:

Communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2.

Petty neither teaches, discloses, nor suggests "communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2," as recited in claim 19.

In Petty, rather, a Web server 38 generates a call identification number which can be used to identify the call connection to the user client 18, as described at column 13, lines 42-46. A call identification number is shared between a plurality of terminals, such as the Web server 38 and a CTI server, and is unique among the servers. This is clear from the fact that a call identification number generated by the Web server 38 is also used by the CTI server 42 to page a subscriber. Thus, the call connection number in Petty is unique between the Web server 38 and the CTI server, but not unique to its generator only, i.e., the Web server 38.

In the claimed invention, moreover, a session identifier for a session between two terminals is only used for that session. In Petty, on the other hand, the call identification number is sent to another subscriber 34, rather than only to the CTI server 40 with which the Web server 38 communicates. Suppose that the Web server corresponds to the first communications terminal in the claimed invention, and that the CTI server of Petty corresponds to the second communications terminal. Then, the above-mentioned disclosure of Petty would mean that a session identifier is transmitted outside of the session between the first communications terminal and the second communications terminal. Therefore, the call identification number of Petty, which is shared between and is unique among the servers, and is used beyond a session between two servers, is to be contrasted with the "first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2" recited in claim 19.

In Petty, moreover, two or more calls are launched simultaneously to different telephone numbers or IP addresses, and the call which is answered first is *bridged* to the user requesting voice communications. In particular, as described at column 4, lines 54-57:

In SNGs, two or more calls are launched simultaneously to different telephone numbers or IP addresses and the call which is answered first is bridged to the user requesting voice communications.

Since, in Petty, two or more calls are launched simultaneously to different telephone numbers or IP addresses and the call which is answered first is bridged to the user requesting voice communications, Petty is not "communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2," as recited in claim 19.

In Petty, moreover, a plurality of calls are launched simultaneously to different numbers or IP addresses for the *same* individual. In particular, as described at column 4, lines 58-61:

With "agent locator", a plurality of calls may be launched simultaneously to different numbers or IP addresses for the same individual or different locations where the individual may be expected to be at any given time.

Since, in Petty, a plurality of calls are launched simultaneously to different numbers or IP addresses for the same individual, Petty is not "communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2," as recited in claim 19.

In Petty, moreover, at least two calls are made for each voice communication session, and the two calls are then *bridged* within the CTI hardware. In particular, as described at column 5, lines 65, 66, and 67, continuing at column 6, lines 1, 2, and 3:

For each voice communication session, at least two calls are made, a first call back from the service provider to the user browsing the WWW and a second forward from the service provider to a service subscriber designated in a rule base to receive the call. The two calls are then bridged within the CTI hardware.

Since, in Petty, two calls are bridged within the CTI hardware, Petty is not "communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2," as recited in claim 19.

In Petty, moreover, clients 18 and 20 typically access their ISPs using *dial-up*, i.e. circuit-switched connections through the PSTN 14. In particular, as described at column 6, lines 18-28:

Internet users such as clients 18 and 20 typically access their ISPs using dial-up connections through the PSTN 14. Alternatively, clients 18, 20 may connect to their ISPs using cable modems (not illustrated) or the like. In some installations a user may have only one dial-up connection. For example, client 18 has a single dial-up connection 22 which serves the dual function of data transfer for Internet sessions and voice transfer for telephone conversations. Using telephone 24 client 20, on the other hand, has a dataline 26 for accessing the Internet and a telephone line 28 for voice communications using telephone 30.

Since, in Petty, clients 18 and 20 typically access their ISPs using dial-up connections through the PSTN 14, Petty would have had no need for "communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2," as recited in claim 19.

In Petty, moreover, *all* administration is handled using OAM forms 64, and the rules established by administration *determine* how the service subscriber 32 leg of each voice communication is established. In particular, as described at column 8, lines 29-37:

Administration is accomplished by logging onto the OAM server 52 which downloads administration forms (not illustrated) required to create and maintain rules respecting the handling of calls initiated by the CT server 40 under control of the web server 38. As will be explained below, the rules established by administration determine how the service subscriber 32 leg of each voice communication is established. All administration is handled using OAM forms 64.

Since, in Petty, the rules established by administration determine how the service subscriber 32 leg of each voice communication is established, Petty would have had no need for "communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session

identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2," as recited in claim 19.

In Petty, moreover, *rule* bases created by the service subscriber 32 *determine* where calls for each category are directed. In particular, as described at column 8, lines 59-65:

The rule bases created by the service subscriber 32 will determine where calls for each category are directed. When a specific category is selected, the user is then presented with a form to determine the preferred medium for voice communication or there is a lookup of a pre-stored preference file commonly called a "cookie" on the client hard drive.

Since, in Petty, rule bases created by the service subscriber 32 determine where calls for each category are directed, Petty would have had no need for "communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2," as recited in claim 19.

In Petty, moreover, a user requests a voice connection over a telephone line using telephone *number* 613-123-4567. In particular, as described at column 9, lines 24, 25, and 26:

In the example illustrated, a user John Doe has requested a voice connection over a telephone line using telephone number 613-123-4567.

Since, in Petty, a user requests a voice connection over a telephone line using telephone number 613-123-4567, Petty would have had no need for "communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2," as recited in claim 19.

Finally, in Petty, a PSTN call is initiated using a trunk link to the PSTN having a PRI interface. In particular, as described at column 10, lines and 42-46:

The CTI server 40 therefore initiates a PSTN call. The PSTN call is initiated using, for example, a trunk link to the PSTN having a PRI interface, well known in the art. A PRI packet is therefore sent over the trunk to the PSTN which completes the call in a manner well known in the art.

Since, in Petty, a PSTN call is initiated using a trunk link to the PSTN having a PRI interface, Petty is not "communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier between the first communications terminal T1 and the second communications terminal T2," as recited in claim 19. Claim 19 is thus submitted to be allowable. Withdrawal of the rejection of claim 19 is earnestly solicited.

Claims 24-27 depend from claim 19 and add further distinguishing elements. Claims 24-27 are thus also submitted to be allowable. Withdrawal of the rejection of claims 24-27 is earnestly solicited.

Claims 20, 21, and 22:

The third clauses of claims 20, 21, and 22 recite substantially:

The first session identification information S1 enabling only the first communications terminal T1 to identify communications between the second communications terminal T2 and the first communications terminal T1.

Petty neither teaches, discloses, nor suggests "the first session identification information S1 enabling only the first communications terminal T1 to identify communications between the second communications terminal T2 and the first communications terminal T1," as discussed above with respect to the rejection of claim 19.

The fourth clauses of claims 20, 21, and 22 recite substantially:

The first session identification information S1 being determined by the first communications terminal T1 so as to be unique only at the first communications terminal T1.

Petty neither teaches, discloses, nor suggests a "first session identification information S1 being determined by the first communications terminal T1 so as to be unique only at the first communications terminal T1," as discussed above with respect to the rejection of claim 19.

The final clauses of claims 20, 21, and 22 recite substantially:

Communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier.

Petty neither teaches, discloses, nor suggests "communicating with the second communications terminal T2 by carrying out transmission and reception of data containing the first session identification information S1, second session identification information S2, the first terminal identifier, and the second terminal identifier," as discussed above with respect to the rejection of claim 19. Claims 20, 21, and 22 are thus also submitted to be allowable, for at least those reasons discussed above with respect to the rejection of claim 19. Withdrawal of the rejection of claims 20, 21, and 22 is earnestly solicited.

Claim 23:

The second clause of claim 23 recites:

Accepting by way of the secure host, from outside the secure host, a call request from an external terminal device to a connectable internal terminal device, or accepting by way of the secure host, from inside the secure host, a call request from an internal terminal device to a connectable external terminal device.

Petty neither teaches, discloses, nor suggests "accepting by way of the secure host, from outside the secure host, a call request from an external terminal device to a connectable internal terminal device, or accepting by way of the secure host, from inside the secure host, a call request from an internal terminal device to a connectable external terminal device," as recited in claim 23. In Petty, rather, clients 18 and 20 typically access their ISPs using dial-up, i.e. circuit-switched connections through the PSTN 14, as discussed above, and would thus have had no need for "accepting by way of the secure host, from outside the secure host, a call request from an external terminal device to a connectable internal terminal device, or accepting by way of the secure host, from inside the secure host, a call request from an internal terminal device to a connectable external terminal device," as recited in claim 23.

The fourth clause of claim 23 recites:

When the secure host has received, from the external terminal device or the internal terminal device, voice data containing the session identification information.

Petty neither teaches, discloses, nor suggests "when the secure host has received, from the external terminal device or the internal terminal device, voice data containing the session identification information," as discussed above with respect to the rejection of claim 19. Claim 23 is thus submitted to be allowable. Withdrawal of the rejection of claim 23 is earnestly solicited.

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Conclusion:

Accordingly, in view of the reasons given above, it is submitted that all of claims 19-27 are allowable over the cited references. Allowance of all claims 19-27 and of this entire application is therefore respectfully requested.

If there are any formal matters remaining after this response, the Examiner is invited to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing this Amendment, please charge them to our Deposit Account No. 19-3935.

Respectfully submitted,

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